

### **Remarks**

The Applicants have amended the Specification to place it into more contemporary form. No substantive changes have been made. Entry into the official file is respectfully requested.

The Applicants note with appreciation the withdrawal of all of the prior rejections.

The Applicants also note the rejection of Claim 11 under 35 U.S.C. §112. That claim has been amended in accordance with the Examiner's helpful suggestion to provide appropriate antecedent basis. The Applicants respectfully submit that Claim 11 is now in compliance with §112. Withdrawal of the rejection is respectfully requested.

The Applicants note the rejection of Claim 11 under 35 U.S.C. §103 over the hypothetical combination of Shigeo with Clark '690. The Applicants also note that there are comments addressed not only to Claim 11 in that rejection but also to Claims 12 and 14. Those comments may be found at the end of the paragraph labeled "7" about midway of page 4 of the Official Action. The Applicants will therefore treat the rejection as if it applies to all of Claims 11, 12 and 14. The Applicants respectfully request a confirmation that the rejection is indeed applied to all three of those claims.

In any event, the Applicants respectfully submit that the rejection does not apply to Claims 11 and 14. This is because Clark '690 is not prior art to those claims. In that regard, the Applicants note that this issue was previously addressed in the Applicants' Amendment dated September 14, 2004 and received in the PTO on September 16, 2004. In that instance, the Applicants provided a certified English translation of the Applicants' JP 2001-023474 priority application that was filed on January 31, 2001. That January 31, 2001 filing date predates the earliest effective filing date of Clark which is December 10, 2001. The Applicants respectfully submit that the English translation of the JP '474 priority document provides full support for the subject matter of both Claims 11 and 14. The Applicants commend the Examiner's attention to that earlier Amendment and the certified English translation that was enclosed at that time. It can be seen that the subject matter of Claims 11 and 14 is fully supported. Therefore, the Applicants respectfully submit that Clark '690 is not prior art to Claims 11 and 14. Accordingly, the Applicants respectfully submit that Clark '690 is unavailable for combination with Shigeo and the rejection as it applies to Claims 11 and 14 must be withdrawn, which is respectfully requested.

With respect to Claim 12, the Applicants note that Claim 12 has been amended to include the subject matter of Claim 13. (Claim 13 has accordingly been cancelled.) The Applicants therefore respectfully submit that the rejection is moot.

Separately, the Applicants note the rejection of Claim 13 over the further hypothetical combination of Nagayama with Shigeo and Clark '690. Technically, that rejection is moot inasmuch as Claim 13 has been cancelled. However, the Applicants will address the rejection as it now applies to Claim 12.

The Applicants note with appreciation the Examiner's detailed comments theoretically applying all of Nagayama, Shigeo and Clark '690 to the subject matter of what was previously Claim 13 and is now Claim 12. The Applicants respectfully submit, however, that even if one skilled in the art were to make the hypothetical combination, the resulting structure would still fail to teach or suggest the subject matter of Claim 12. In demonstrating such a deficiency on the combination of the three publications, the Applicants will first briefly address Clark '690.

Fig. 1 of Clark '690 is an exploded view of an alignment device 10 for assembly and mounting of assembled deposition magnetic mask segments 12a, 12b, 12c and 12d. This is explained at column 3, lines 14-16. The masks 12a, 12b, 12c and 12d are shown in a state after assembly in Fig. 1. Fig. 1 does not show, however, how to place the components into the assembled state. The Applicants believe that each of the mask segments is first placed on the upper surface of the frame 22. Then, each one is adjusted in position along the engraved alignment lines 19, which is a type of alignment mark, independent of each other. The aligned mask segments on the frame are fixed with an adhesive tape 25 and a magnetic cross bar. Additionally, Fig. 1 shows four mask segments ( $m=4$ ) assembled on the frame 22 as indicated in the rejection.

The rejection further relies on Shigeo and Nagayama. Shigeo is not of particular importance in this analysis and the Applicants therefore invite the Examiner's attention in particular to Nagayama. It is important to note that the rejection relies on the notion that it would have been obvious to:

have re-used the  $m$  masks of Clark to have produced the pixels of the three colors by moving the masks between depositions of the colors because Nagayama teaches that such is a suitable method of depositing red, blue, and green pixels, thereby resulting in ( $n = 3*m$ ) pixel EL devices.

The Applicants believe that there may be a misunderstanding of the variable “k” as recited in Claim 12. Claim 12 defines “k” as “a number of said array of deposition apertures formed on said each deposition mask.” “k” is also defined as integer in the range of 2 to n.

It appears to the Applicants as if the rejection understands the variable “k” to mean the number of colors, *i.e.*, three colors --- red, blue and green. However, that is not the meaning of the variable “k”. Instead, “k” is the number of arrays of deposition apertures provided in each of the plurality of deposition masks. The number of arrays of deposition apertures “k” is explained in detail in the Applicants’ Specification beginning on page 35 at line 12 and extending through page 36 at line 21. There is a further description beginning at page 53 at line 17 and extending through page 54, line 4. The text at the top of page 36 in particular makes it clear that “k” does not refer to the three colors, namely red, blue and green. This can be seen because each deposition mask has four aperture arrays corresponding to four organic EL devices. That particular example causes “k” to be the integer 4. The Applicants respectfully submit that having a  $k = 4$  provides ample evidence that “k” does not represent the number of colors because the maximum number of colors is, of course, three.

Referring in particular to Nagayama, the Applicants respectfully submit that there is no teaching or suggestion on the part of Nagayama that there is “k” component as defined by the Applicants and, therefore, even if one skilled in the art were to hypothetically combine Nagayama with Clark ‘690 and Shigeo, the resulting structure would still fail to teach or suggest the subject matter of Claim 13. The Applicants therefore respectfully submit that the rejection is inapplicable to Claim 12.

In light of the foregoing, the Applicants respectfully submit that the entire Application is now in condition for allowance with is respectfully requested.

Respectfully submitted,



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